

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOSHUA RODRIGUEZ
Plaintiff *Pro Se*

23CV-08313-RER-CHK

-Against-

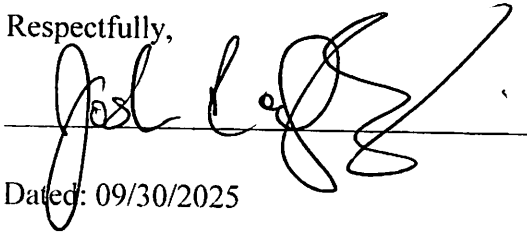
**MOTION TO STAY
DISCOVERY**

LESLIE DUNN Investigator ACS Agency
Defendant

SUMMARY

I Plaintiff *Pro Se* Joshua Rodriguez file this Motion based on "Stay to Discovery" to put a pause on the Discovery on the remaining Defendant ACS Investigator Leslie Dunn, while Co-Defendant NYPD Detective Declar Savage Appeal gets sorted out at the United States Court of Appeals of the Second Circuit. The claims against ACS intertwined with the issues of the Appeal, proceeding with discovery could undermine the protections of qualified immunity. A stay will promote judicial economy and avoid conflicting rulings or unnecessary expenditures of time and resources. *Landis v. North American Co.*, 299 U.S. 248 (1936)

Respectfully,



Dated: 09/30/2025

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